

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

_____	X
KEVIN PAROT, Individually and on Behalf of :	Civil Action No. 1:22-cv-00394-ENV-RLM
All Others Similarly Situated,	:
	:
Plaintiff,	:
	:
vs.	:
	:
CLARIVATE PLC, JERRE STEAD, and	: <u>CLASS ACTION</u>
RICHARD HANKS,	:
	:
Defendants.	:
_____	X

STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULE FOR
CONSOLIDATED COMPLAINT AND MOTION TO DISMISS BRIEFING

Lead Plaintiff Pension Trust Fund for Operating Engineers (“Lead Plaintiff”) and Clarivate Plc, Richard Hanks, and Jerre Stead (collectively, “Defendants”) (together, the “Parties”), by and through their undersigned counsel, stipulate and agree and jointly request that the Court approve the Parties’ proposed schedule set forth below:

WHEREAS, three putative class actions were filed against Defendants styled *Parot v. Clarivate Plc et al.*, 1:22-cv-00394 (E.D.N.Y.); *Boynton Beach Firefighters Pension Fund v. Clarivate Plc et al.*, 1:22-cv-01371 (E.D.N.Y.); and *Ark. Tchr. Ret. Sys. v. Clarivate Plc et al.*, 1:22-cv-01372 (E.D.N.Y.) (collectively, the “Related Actions”).

WHEREAS, by order dated March 14, 2022, the Court so ordered a stipulation between the parties in the *Parot* action regarding, among other things, a schedule for an amended pleading and motion to dismiss (ECF 8);

WHEREAS, by order dated May 18, 2022, the Court consolidated the Related Actions, appointed Pension Trust Fund for Operating Engineers to serve as Lead Plaintiff, and approved Lead Plaintiff’s selection of Robbins Geller Rudman & Dowd LLP to serve as Lead Counsel in this litigation (ECF 30);

WHEREAS, the Parties through their undersigned counsel have met and conferred regarding a modest modification to the current schedule for the filing of a consolidated complaint and related motion to dismiss briefing, and have agreed to the schedule set forth below.

IT IS ACCORDINGLY STIPULATED, subject to this Court’s approval, that:

1. Lead Plaintiff shall file a consolidated complaint on or before August 8, 2022;
2. Defendants shall answer, move, or otherwise respond to Lead Plaintiff’s consolidated complaint within 60 days after the filing of the consolidated complaint;

3. Lead Plaintiff shall file an opposition to any motion to dismiss filed by Defendants within 60 days after the filing of any motion to dismiss; and

4. Defendants shall file any reply within 45 days after the filing of Lead Plaintiff's opposition to any motion to dismiss.

Stipulated by and between:

DATED: June 9, 2022

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DATED: June 9, 2022

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s/ BRIAN S. WEINSTEIN (*with permission*)

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Counsel for Defendants

* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on June 9, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ DARRYL J. ALVARADO

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Mailing Information for a Case 1:22-cv-00394-ENV-RLM Parot v. Clarivate Plc et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)